

EXHIBIT

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December 4, 2020

Richard C. Mason

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VIA EMAIL

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**Re: National Liability & Fire Insurance Company v. Brimar Transit;
Civil Action No. 18-cv-1129**

Dear Counsel:

As you know, this firm represents National Liability & Fire Insurance Company ("National").

I write with regard to the action pending in Allegheny County, captioned *M.M., parent and natural guardian of K.M., a Minor v. School District of Pittsburgh, Pa. and Brimar Transit, Inc.*, No. GD18-003257 (the "Allegheny County Action"). This letter confirms that, if National makes any settlement payment to the plaintiffs in the Allegheny County Action, National will seek full reimbursement to the extent of that payment from Brimar Transit, Inc. and School District of Pittsburgh. Because the Commercial Policy issued by National to Brimar was not intended to cover the claims in the Allegheny County Action and, National believes, ultimately will be declared not to cover those claims, National will be entitled to reimbursement from Brimar and School District of amounts it pays on their behalves to resolve the Allegheny County Action. Any settlement payment by National that resolves the Allegheny County Action also will extinguish any duty of National to indemnify any Insured concerning that Action.

Please be guided accordingly.

Sincerely,

COZEN O'CONNOR

A handwritten signature in black ink, appearing to read "RCM", written over a horizontal line.

BY: RICHARD C. MASON

RCM:mm

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